

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

IN RE UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

Case No.: 3:23-MD-03084 CRB

**JOINT LETTER REGARDING  
PLAINTIFFS' REQUEST FOR  
PRODUCTION OF U.S. SAFETY  
REPORT DATA**

This Document Relates to:

ALL ACTIONS

Judge: Hon. Lisa J. Cisneros  
Courtroom: G – 15<sup>th</sup> Floor

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## **I. Joint Statement**

Pursuant to the Court's December 19, 2024 and December 24, 2024 Orders (ECF Nos. 1996 and 2016), the parties respectfully submit this joint discovery letter regarding disputes related to Defendants' production of data related to its U.S. Safety Reports. The parties have reached an agreement on all issues related to Defendants' production of safety data currently pending before the Court.

### **A. Access and Functionality Issues**

As of the time of this filing, all known access and functionality issues have been resolved.<sup>1</sup> Defendants will produce the data addressed in the parties' December 23, 2024 agreement as a reproduction that includes all newly-produced data as well as all previously-produced data, rather than a supplemental production that includes only the newly-produced data.

### **B. Attachments**

The parties agree that Defendants will produce all files and data attached to Jira and Bliss tickets for up to 375 safety incidents of Plaintiffs' choosing.<sup>2</sup> The files and data will be produced pursuant to the following schedule:

1. Plaintiffs will identify their first selection of 125 incidents by January 24, 2025.<sup>3</sup>
2. Plaintiffs will identify their second selection of 125 incidents by January 31, 2025.
3. Defendants will begin rolling productions by February 14, 2025.
4. Plaintiffs will identify their final selection of 125 incident reports by February 14, 2025.
5. Defendants will complete productions by March 14, 2025.

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<sup>1</sup> Plaintiffs cannot be certain that no further access or functionality difficulties will arise as additional data is produced and as Plaintiffs' experts continue to analyze the data. Although the parties will endeavor to work cooperatively to resolve any additional difficulties, Plaintiffs reserve their right to raise any further or amplified access or functionality issues that may arise with the Court if the parties are unable to timely resolve those issues.

<sup>2</sup> Plaintiffs may select from incidents that were reported to have occurred between January 1, 2017 and December 31, 2022.

<sup>3</sup> The dates herein are contingent upon Defendants' complete production of incident data by January 17, 2025 pursuant to the parties' December 23, 2024 agreement (ECF No. 2011).

**CERTIFICATE OF SERVICE**

I hereby certify that on January 10, 2025 I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will automatically send notification of the filing to all counsel of record.

By: /s/ Roopal P. Luhana